IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UMG RECORDINGS, INC., a Delaware corporation; ARISTA RECORDS LLC, a) Case No.: 08 C 474
Delaware limited liability company;)
LAFACE RECORDS LLC, a Delaware limited liability company; SONY BMG	
MUSIC ENTERTAÎNMENT, a Delaware	Honorable Marvin E. Aspen
general partnership; and LOUD RECORDS LLC, a Delaware corporation,)
Plaintiffs,))
V.	
*.	
PARRISH BROWN,	
Defendant.)

MOTION FOR DEFAULT JUDGMENT AND PERMANENT INJUNCTION

Plaintiffs, UMG Recordings, Inc., Arista Records LLC, Laface Records LLC, Sony BMG Music Entertainment, and Loud Records LLC (collectively, the "Plaintiffs"), by and through their undersigned attorneys, and pursuant to Rule 55 of the Federal Rules of Civil Procedure, hereby move for the entry of default judgment and a permanent injunction against Defendant Parrish Brown ("Defendant"). In support thereof, Plaintiffs respectfully state as follows:

- On January 22, 2008, Plaintiffs filed their Complaint for Copyright Infringement (the "Complaint") against Defendant.
- On March 17, 2008, Defendant was served with a Summons to appear in the above-captioned proceeding. As such, Defendant's responsive pleading was due on or before April 7, 2008.
- 3. Defendant has not appeared in this action and has not filed a responsive pleading to the Complaint.

4. Accordingly, Plaintiffs hereby move for entry of a specific default judgment against Defendant pursuant to Rule 55 of the Federal Rules of Civil Procedure.

5. Plaintiffs request statutory damages pursuant to 17 U.S.C. § 504(c) in the amount of \$6,000.00, costs pursuant to 17 U.S.C. § 505 in the amount of \$480.00, and the requested permanent injunction as set forth more fully in the Memorandum in Support of Plaintiffs' Motion for Default Judgment and Permanent Injunction (the "Memorandum"), filed contemporaneously herewith.

WHEREFORE, for the reasons stated herein and in the Memorandum, Plaintiffs respectfully request that the Court enter an Order for (1) default judgment in favor of Plaintiffs and against Defendant; (2) statutory damages in the total amount of \$6,000.00; (3) an injunction in the form sought in the Complaint; (4) costs of \$480.00; and (5) for any other relief this Court deems appropriate under the circumstances.

Respectfully submitted,

UMG RECORDINGS, INC.; ARISTA RECORDS LLC; LAFACE RECORDS LLC; BMG MUSIC; SONY BMG MUSIC ENTERTAINMENT and LOUD RECORDS LLC,

DATED: April 22, 2008

By: /s/ Amanda C. Jones

One of their attorneys

Keith W. Medansky (ARDC #06195673) Ann M. Bredin (ARDC #06255663) Amanda C. Jones (ARDC #06286509) **DLA PIPER US LLP** 203 N. LaSalle Street Suite 1900 Chicago, Illinois 60601-1293 Tel. (312) 368-4000 Fax. (312) 236-7516